

UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

RECEIVED
CRIMINAL DIVISION
JUL 21 3 10 PM '80
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

SUPPLEMENTAL STATEMENT

Pursuant to Section 2 of the Foreign Agents
Registration Act of 1938, as Amended

For Six Month Period Ending JUN 4 1980
(Insert date)

Name of Registrant

Registration No. 1750

ARNOLD & PORTER

Business Address of Registrant

1200 New Hampshire Avenue, N.W.
Washington, D. C. 20036

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual: N.A.

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(4) Address	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

2. Explain fully all changes, if any, indicated in Item 1.

The Registrant has opened a branch office located at
633 Seventeenth Street, Denver, Colorado 80202.

The Registrant has moved its main office to 1200 New
Hampshire Avenue, N.W., Washington, D. C. 20036.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name	Position	Date Connection Ended
Robert E. Herzstein	Partner	4/9/80

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? ☒ Yes No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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See Attachment No. 1

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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? Yes ☒ No ☐

If yes, identify each such person and describe his services.

James A. Beat and Lawrence C. Maisel, who have previously filed Short-Form Registration Statements, have rendered services to foreign principals.

Alexander E. Bennett, J. Bradway Butler, Myron P. Curzan, Stephen L. Hester and James W. Jones, who became partners during earlier periods, began to render services to foreign principals during this period.

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6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period?
Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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Henry Philip

Terence Stopford

Foreign Associate

5/31/80

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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity?
Yes ☐ No ☒ */

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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*/ See Attachment No. 2

II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?
Yes ☒ No ☐

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date of Termination</i>
Government of Morocco	12/20/79
Asociacion de Fabricantes de Productores Quimicos	06/04/80

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9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

<i>Name and address of foreign principal</i>	<i>Date acquired</i>
See Attachment No. 3	

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10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

See Attachment No. 4

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

See Attachment No. 5

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?

Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See Attachment No. 6

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes ☐ No ☒

If yes, describe fully.

² The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Attachment No. 7

Total

14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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See Attachment No. 8

Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☐ No ☒ */

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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*/ See Attachment No. 9

V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

Union Nacional de Productores de Hortalizas; Dutch Employers Federation; The London Commodity Exchange, Ltd.

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?
Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☐ Magazine or newspaper ☐ Motion picture films ☒ Letters or telegrams
articles
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other ☐ Lectures or
publications speeches

☒ Other (specify) Congressional testimony, briefs, memoranda

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☒ Public Officials ☒ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☒ Educational institutions
☐ Government agencies ☒ Civic groups or associations ☐ Nationality groups

☒ Other (Specify) trade association, consultants, clients, attorneys

21. What language was used in this political propaganda:

☒ English ☐ Other (specify) _____

22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?

Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?

Yes ☒ No ☐

VI - EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☒ No ☐

Exhibit B⁷ Yes ☒ No ☐

If no, please attach the required exhibit.

- (a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes ☒ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☒ No ☐

If no, please attach the required amendment.

⁶ The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

⁷ The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period.

Yes ☐ No ☐ N.A.

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Brooksley E. Landau
Brooksley E. Landau

Subscribed and sworn to before me at Washington, D.C.

this 18th day of July, 19 80

Susan D.E. Wasilewski
(Signature of notary or other officer)

My Commission Expires March 14, 1985

⁸ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

ATTACHMENT NO. 1

4. Have any persons become partners, officers, directors or similar officials during this six-month reporting period? Yes X No

If yes, furnish the following information:

<u>Name</u>	<u>Residence Address</u>	<u>Citizenship</u>	<u>Position</u>	<u>Date Assumed</u>
James A. Beat	700 7th Street, S.W. # 301 Washington, D. C. 20024	United States	Partner	1/1/80
Lawrence C. Maisel	1330 21st Street, N.W. Washington, D. C. 20036	United States	Partner	1/1/80
Thomas D. Nurmi	400 Madison Street # 1803 Alexandria, Virginia 22314	United States	Partner	1/1/80
Paul S. Ryerson	221 9th Street, S.E. Washington, D. C. 20003	United States	Partner	1/1/80
Robert S. Thorpe	9th Infield Ct., North Rockville, Maryland 20854	United States	Partner	1/1/80
Harris D. Sherman	4210 East Sixth Avenue Denver, Colorado 80220	United States	Partner	5/1/80

ATTACHMENT NO. 2

7. During this six-month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes _____ No X */

If yes, furnish the following information:

*/ However, the following persons, hired previously, began to render services relating to foreign principals during this period.

<u>Name</u>	<u>Residence Address</u>	<u>Position or Connection</u>	<u>Date Connection Began</u>
Howard B. Adler	2501 Calvert Street, N.W. Washington, D. C. 20008	Associate	1/8/79
Eli Whitney Debevoise II	3069 Porter Street, N.W. Washington, D. C. 20008	Associate	9/4/79
Douglas Ell	1330 New Hampshire Ave., N.W. # 204 Washington, D. C. 20036	Associate	9/4/79
Pamela K. Green	3738 Huntington Street, N.W. Washington, D. C. 20015	Associate	9/24/79
Peter T. Grossi, Jr.	2010 Wellfleet Court Falls Church, Virginia 22043	Associate	8/1/74
Catherine B. Hyatt	104 Roberts Lane # 300 Alexandria, Virginia 22314	Associate	8/21/78
Robert J. Jones	2200 Columbia Pike # 315 Arlington, Virginia 22204	Associate	9/4/73
Peter R. Maier	4014 Lorcom Lane Arlington, Virginia 22207	Associate	9/6/77
Maxwell J. Mehlman	3500 Quebec Street, N.W. Washington, D. C. 20016	Associate	10/6/75
Ronald B. Ravikoff	3319 Pendleton Drive Silver Spring, Maryland 20902	Associate	9/19/77
Norman Mark Sinel	3710 Harrison Street, N.W. Washington, D. C. 20015	Counsel	9/17/79
David P. Towey	6315 Bannockburn Drive Bethesda, Maryland 20034	Associate	6/10/74
Enid L. Veron	11517 Hornfair Court Potomac, Maryland 20854	Associate	8/13/79
Abigail Watts-FitzGerald	2102 17th Street, N.W. Washington, D. C. 20009	Associate	9/4/79

ATTACHMENT NO. 3

9. Have you acquired any new foreign principal during this six-month reporting period? Yes X No

If yes, furnish the following information:

<u>Name and Address of Foreign Principal</u>	<u>Date Acquired</u>
Ets. Beherman Demoen N.V./S.A., Engineering Division Industrieweg 3 2630 Bornem Belgium	October 1979 ^{*/}
Corporation for Economic Development H.I. Ltd. 2 Jabotinsky Road Ramat-Gan P.O.B. 3230, Israel	March 1979 ^{*/}
Dutch Employers Federation Princess Beatrix Lann # 5 The Hague, Netherlands	March 1980
Table Grape Growers Association Boulevard Transversal Km. 4.5 Hermosillo, Sonora, Mexico	April 1980

*/ Prior to February 1980, representation of these foreign principals was limited to activities exempt from registration under Section 3 of the Act.

ATTACHMENT NO. 4

10. In addition to those named in Items 8 and 9, if any, list the foreign principals whom you continued to represent during the six-month reporting period.

Ambassador of the Swiss Confederation
Swiss Cheese Union, Inc.
Switzerland Gruyere Processed Cheese Manufacturers
Association
Federation Suisse des Associations de Fabricants
d'Horlogerie
Embassy of the Government of Israel
International Commodities Clearing House, Ltd.
The London Commodity Exchange Company, Ltd.
Union Nacional de Productores de Hortalizas
Government of the Republic of Panama
Government of Nicaragua
British American Arts Association (U.K.)
Dr. Dirk Alan Maxen-McIntire

ATTACHMENT NO. 5

11. During this six-month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes X No

If yes, identify each such foreign principal and describe in full detail your activities and services:

Ambassador of the Swiss Confederation

The Registrant rendered advice on U.S. laws, regulations and policies concerning commodities, foreign military sales, trade policy, watch imports, antitrust, tax laws and treaties, cheese imports, debt collection, regulation of bank holding companies, the Buy American Act, U.S. government procurement and pending litigation in U.S. courts. Further, Registrant represented the principal in the cases In the Matter of the Petition of Josette Geisser, divorced Bauer and Josette Claire Bauer nee Geisser v. United States and as amicus curiae in the case of Allis-Chalmers Corp. v. Arnold.

Federation Suisse des Associations de Fabricants d'Horlogerie

The Registrant rendered advice on U.S. laws, regulations and policies concerning international trade, imports of watches, product warranties, and exports to the Soviet Union. In addition, the Registrant represented the principal in connection with International Trade Commission Investigation No. 332-96.

Lawrence Sunderland

Mr. Sunderland provided consulting services to the Registrant concerning economic and statistical matters regarding watch imports and trade, import relief, international trade, and economic and statistical matters regarding vegetable and fruit imports. Some of these consulting services were rendered in connection with International Trade Commission Investigation No. 332-96, and an antidumping proceeding before the Commerce Department.

Embassy of the Government of Israel

The Registrant rendered advice on U.S. laws, regulations and policies in connection with economic matters and United States supply of oil.

International Commodities Clearing House, Ltd. and The
London Commodity Exchange Company, Ltd.

The Registrant rendered advice on U.S. laws, regulations and policies concerning CFTC reporting requirements applicable to foreign brokers and traders, CFTC regulations on service of process upon foreign brokers and traders, developments on the contemplated pilot program in options trading, the Congressional ban on options trading, developments in the silver market, and CFTC Rule 15.05. In addition, the Registrant assisted in preparation of comments filed in a rulemaking proceeding before the CFTC relating to service of process upon foreign brokers and traders.

Government of the Republic of Panama

The Registrant rendered advice concerning a U.S. executive order on the importation of alcoholic beverages into the former Canal Zone. The Registrant also rendered advice concerning the Agreement in Implementation of Article IV of the Canal Treaty.

Asociacion de Fabricantes de Productores Quimicos

The Registrant rendered advice concerning U.S.-Venezuela bilateral trade negotiations and possible extension of the Generalized System of Preferences to Venezuela.

Union Nacional de Productores de Hortalizas

The Registrant rendered advice on U.S. laws, regulations and policies concerning the Antidumping Act of 1921 and environmental regulations. The Registrant represented the principal in connection with an antidumping proceeding conducted by the Commerce Department concerning certain fresh winter vegetables from Mexico.

British American Arts Association (U.K.)

The Registrant rendered advice on U.S. laws, regulations and policies concerning taxation, and fund-raising in the United States. One of the Registrant's employees serves as a member of the Steering Committee and Executive Committee of the principal, assisted the principal in arranging a lecture tour in the U.S. for a British speaker, assisted the principal in opening a bank account, provided general information on services and

activities of the principal, assisted the principal in organizing a seminar in London on tax policy and private support for the arts, and delivered a paper and speech at that seminar.

Dr. Dirk Alan Maxen-McIntire

The Registrant rendered advice on U.S. laws, regulations and policies concerning possible amendment of Section 349(a)(1) of the Immigration and Nationality Act.

Ets. Beherman Demoen N.V./S.A., Engineering Division

The Registrant rendered advice on U.S. laws, regulations and policies concerning sales of wheeled military vehicles and other products in the United States and abroad and performance of maintenance and overhaul functions for vehicles assigned to U.S. military forces in Europe. The Registrant assisted the principal in presenting its military vehicle to the U.S. Armed Services and in contacting various U.S. companies to participate in joint manufacture and marketing of various products. In addition, the Registrant represented the principal in negotiations for an agreement permitting the principal to market in Europe one product of a U.S. company.

Corporation for Economic Development H.I. Ltd.

The Registrant rendered advice on U.S. laws, regulations and policies concerning tax, securities and other legal requirements with respect to raising capital in the United States. In addition, the Registrant participated in negotiations with representatives of the Government of Israel on a contract authorizing the principal to undertake housing development activities in the State of Israel under a special financing arrangement. The Registrant had discussions with U.S. developers, financial institutions, and others concerning their possible participation in the construction and financing of housing to be built in the State of Israel. The Registrant also had discussions with agricultural experts, U.S. developers, and potential corporate joint venturers with respect to the possible development of small farming ventures in the United States. In addition, the Registrant rendered advice concerning development of a new television network in Israel and a joint venture in the United States for development of a television program series.

Dutch Employers Federation

The Registrant rendered advice on U.S. laws, regulations, policies and legislation concerning state taxing systems, and submitted testimony on behalf of the principal to the Committee on Ways and Means, U.S. House of Representatives, with respect to H.R. 5076.

Table Grape Growers Association

The Registrant rendered advice on U.S. laws, regulations, policies and proposed legislation affecting importation of table grapes from Mexico.

Government of Nicaragua

The Registrant has represented the principal in the case of CARNIC v. Central American Beef and Seafood Trading Corp. (S.D. Fla.).

Swiss Cheese Union, Inc. and Switzerland Gruyere Processed Cheese Manufacturers Association

The Registrant rendered advice on U.S. laws, regulations and policies concerning imports of cheese.

ATTACHMENT NO. 6

12. During this six-month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below? Yes X No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Ambassador of the Swiss Confederation

On behalf of the principal, the Registrant had discussions concerning indictments pending against VSL Corporation and Rene Friedrich with Richard Favretto and Mark Leddy of the Antitrust Division of the Department of Justice.

Asociacion de Fabricantes de Productores Quimicos

On behalf of the principal, the Registrant had discussions concerning possible extension of the Generalized System of Preferences to Venezuela with John Rosenbaum, Office of Special Representative for Trade Negotiations.

Union Nacional de Productores de Hortalizas

On behalf of the principal, the Registrant had contact concerning the possible application of the Antidumping Act of 1921 to perishable produce from Mexico with Susanne Butcher, Steven Gibson, Mr. Nepper and Mr. Pastorino, U.S. Department of State; Alexander Sierck, U.S. Department of Justice; Steven Lande and John Rosenbaum, Office of Special Representative for Trade Negotiations; Dennis Rapp, a member of the Council on Wage and Price Stability staff; Robert Pastor, National Security Council; Charles Montford, Joseph Crapa, Frank Getlein, Harriet Lawler and Henry Banta, members of U.S. House of Representatives staff; Mary Hawkins and William McLaughlin, members of U.S. Senate staff. In addition, on behalf of the principal, the Registrant transmitted copies of briefs and memoranda concerning the antidumping investigation conducted by the U.S. Commerce Department to some of the government officials listed above and to other individuals and organizations, as reflected in Dissemination Reports.

Table Grape Growers

On behalf of the principal, the Registrant had discussions concerning proposed legislation affecting importation of table grapes from Mexico with Joseph Crapa, a member of the U.S. House of Representatives staff.

Government of Nicaragua

On behalf of the principal, the Registrant had discussions concerning foreign assistance and pending litigation in U.S. courts with Faye Armstrong, Office of Legal Advisor, Department of State.

Ets. Beherman Demoen N.V./S.A., Engineering Division

On behalf of the principal, the Registrant had discussions concerning sales of wheeled military vehicles with Maj. Gen. Richard Bowman, Director, European & NATO Affairs, OSD; Col. Charles W. Richardson, Jr., NATO Standardization Div., OSD (ISA); Everett Greinke, Director/ NATO & European Affairs, OSD (ISA); Richard B. Ray, Administrative Assistant to Senator Nunn; Arnold Punaro, Assistant Press Secretary to Senator Nunn; Irwin Pernick, Political Officer, Bureau of Politico-Military Affairs, Office of Security Assistance and Sales, Department of State; Lt. Col. Samuel J. Watson, Office of European Security and Political Affairs (EUR/RPM), Department of State; Dr. Walter B. LaBerge, Principal Deputy, USDRE, Pentagon; Col. Charles J. Garvey, Military Assistant, Land Warfare, Pentagon; Charles W. Bernard, Director, OSD/OUSDRE, Land Warfare, Pentagon; Reginald Bartholomew, Director, Bureau of Politico-Military Affairs, Department of State; Col. Fitzgerald, Acting Cmdr., Quantico; Cols. Chase, Williams, Menrod, and deChristopher, USMC Staff, Rapidly Deployable Forces Project; Brig. Gen. Dale A. Vesser, Aide to Maj. Gen. Kelly, Rapidly Deployable Forces Project, Pentagon; Col. Chase (USMC), Dave Amick (USMC), Col. Ira Dorsey (USA), Carl Onesty (USMC), Col. Les Brownlee (USA), Rapidly Deployable Forces Project, Pentagon. On behalf of the principal, the Registrant also had discussions concerning performance of maintenance and overhaul functions for vehicles assigned to U.S. military forces in Europe with Maj. Gen. Richard Bowman, Director, European & NATO Affairs, OSD; Gen. Nord, Head of U.S. Army Maintenance, Pentagon; and Donald Lucas, Civilian Aide to Gen. Nord, Pentagon.

ATTACHMENT NO. 7

14.(a) RECEIPTS - MONIES

During this six-month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes X No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Asociacion de Fabricantes de Productores Quimicos</u>			
12/11/79	Asoquim	Legal Fees	\$ 2,500.00
12/11/79	Asoquim	Disbursements	339.65
06/04/80	Banco de Venezuela, S.A.	Legal Fees	15,000.00
06/04/80	Banco de Venezuela, S.A.	Disbursements	121.58
<u>Ets. Beherman Demoen N.V./S.A., Engineering Division</u>			
03/31/80	Beherman	Legal Fees	\$ 25,000.00
03/31/80	Beherman	Disbursements	515.06
06/03/80	American Airlines, Inc.	Ticket Refund	44.00
<u>Corporation for Economic Development H.I. Ltd. */</u>			
04/29/80	Eastern Airlines	Ticket Refund	\$ 27.00
<u>International Commodities Clearing House, Ltd.</u> <u>The London Commodity Exchange Company Ltd.</u>			
03/12/80	National Westminster Bank Ltd.	Legal Fees	\$ 1,101.20
04/17/80	London Commodity Exchange	Legal Fees	12,398.80
04/17/80	London Commodity Exchange	Disbursements	260.10
<u>Government of Morocco</u>			
12/20/79	DGA International	Legal Fees	\$ 2,500.00
12/20/79	DGA International	Disbursements	1.20

*/ This list includes only monies received after the exemption from registration for representation of this client no longer applied.

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Dr. Dirk Alan Maxen-McIntire</u>			
04/07/80	Maxen-McIntire	Disbursements	\$ 40.00
<u>Government of Nicaragua</u>			
01/24/80	Banco Nacional de Panama	Legal Fees	\$ 159,826.72
01/24/80	Banco Nacional de Panama	Disbursements	23,362.78
03/24/80	Banco Central de Nicaragua	Legal Fees	34,659.45
03/24/80	Banco Central de Nicaragua	Disbursements	5,506.89
<u>Ambassador of Swiss Confederation</u>			
12/14/79	Embassy of Switzerland	Legal Fees	\$ 11,250.00
12/14/79	Embassy of Switzerland	Disbursements	37.81
03/17/80	Embassy of Switzerland	Legal Fees	6,250.00
03/17/80	Embassy of Switzerland	Disbursements	304.14
<u>Federation Suisse des Associations de Fabricants d'Horlogerie</u>			
01/18/80	Federation Horlogerie Suisse	Legal Fees	\$ 6,250.00
01/18/80	Federation Horlogerie Suisse	Disbursements	37.33
04/15/80	Federation Horlogerie Suisse	Legal Fees	6,250.00
04/15/80	Federation Horlogerie Suisse	Disbursements	144.30
<u>Union Nacional de Productores de Hortalizas</u>			
12/28/79	Continental Airlines	Ticket Refund	\$ 203.00
01/30/80	West Mexico Vegetable Dist.	Legal Fees	38,200.00
01/30/80	West Mexico Vegetable Dist.	Disbursements	5,506.68
03/04/80	West Mexico Vegetable Dist.	Disbursements	13,053.80
03/17/80	Banco Provincial de Sinaloa	Disbursements	24,497.41
03/25/80	West Mexico Vegetable Dist.	Legal Fees	36,180.00
03/25/80	West Mexico Vegetable Dist.	Disbursements	10,022.14
04/29/80	Banco Provincial de Sinaloa	Legal Fees	29,050.00
04/29/80	Banco Provincial de Sinaloa	Disbursements	1,602.88
05/21/80	Banco Provincial de Sinaloa	Legal Fees	36,180.00
05/21/80	Banco Provincial de Sinaloa	Disbursements	10,022.14
05/21/80	West Mexico Vegetable Dist.	Legal Fees	91,350.00
05/21/80	West Mexico Vegetable Dist.	Disbursements	18,747.64
<u>Embassy of the Government of Israel</u>			
1/04/80	State of Israel	Legal Fees	\$ 36,221.00
1/04/80	State of Israel	Disbursements	637.47
TOTAL			<u>\$ 665,202.17</u>

ATTACHMENT NO. 8

15. (a) DISBURSEMENTS - MONIES

During this six-month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes X No

(2) transmitted monies to any such foreign principal? Yes No X

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Ambassador of the Swiss Conferderation</u>			
Various	Xerox Corporation	Duplicating	\$ 283.84
Various	C&P Telephone	Telephone	66.01
Various	U.S. Postal Service	Postage	7.90
Various	A&P Employees	Local Transportation	134.40
Various	A&P Employees	Cash Expense	65.03
Various	L. Sunderland	Cash Expense	9.56
04/23/80	MacKenzie & Associates	Outside Secretarial	11.00
03/25/80	Sati Rikhy	Professional Service	672.00
Total			\$ 1,249.74

Swiss Cheese Union, Inc. and Switzerland
Gruyere Processed Cheese Manufacturers' Association

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
Various	C&P Telephone	Telephone	\$ 7.32
02/19/80	U.S. Dept. of Commerce	Publication	50.00
Total			\$ 57.32

Federation Suisse des Associations
de Fabricants d'Horlogerie

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
Various	Xerox Corporation	Duplicating	\$ 134.95
Various	C&P Telephone	Telephone	31.03
Various	A&P Employees	Local Transportation	32.65
Various	A&P Employees	Cash Expense	2.50
12/27/79	Sati Rikhy	Professional Service	24.00
01/10/80	L. Sunderland	Cash Expense	3.00
Total			\$ 228.13

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>London Commodity Exchange Co., Ltd. and</u>			
<u>International Commodities Clearing House Ltd.</u>			
Various	A&P Employees	Local Transportation	\$ 8.70
Various	A&P Employees	Cash Expense	37.85
Various	C&P Telephone	Telephone	35.64
Various	U.S. Postal Service	Postage	63.75
02/05/80	J. Umana	Travel Expense	15.77
04/16/80	MacKenzie & Associates	Outside Secretarial	16.50
05/22/80	RCA Global Communication	Telexes	23.76
Total			\$ 201.97

Embassy of the Government of Israel

Various	Xerox Corporation	Duplicating	\$ 7.00
02/13/80	A&P Employees	Local Transportation	6.10
02/13/80	A&P Employees	Cash Expense	12.16
04/16/80	MacKenzie & Associates	Outside Secretarial	5.50
Various	Xerox Corporation	Duplicating	219.90
Various	C&P Telephone	Telephone	470.96
Various	A&P Employees	Local Transportation	132.55
Various	A&P Employees	Cash Expense	251.81
Various	U.S. Postal Service	Postage	8.21
Various	W. Rogers	Travel Expense	335.00
Various	H. Adler	Travel Expense	324.00
Various	S. Lang	Travel Expense	479.05
12/31/79	Sky Courier Network	Air Courier	89.50
Various	RCA Global Communication	Telexes	149.76
4/24/80	Western Union	Telegram	31.68
5/29/80	Alderson Reporting Co.	Professional Service	34.24
4/16/80	MacKenzie & Associates	Outside Secretarial	5.50
Total			\$ 2,562.92

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Corporation for Economic Development H.I. Ltd. */</u>			
Various	Xerox Corporation	Duplicating	\$ 151.00
Various	C&P Telephone	Telephone	902.65
Various	U.S. Postal Service	Postage	11.49
Various	A&P Employees	Local Transportation	33.30
Various	A&P Employees	Cash Expense	71.59
Various	P. Berger	Travel Expense	876.73
Various	M. Curzan	Travel Expense	2,286.01
03/27/80	James Edmondson	Professional Service	7,967.21
05/22/80	RCA Global Communications	Telexes	<u>120.96</u>
Total			\$ 12,420.94

Dutch Employers Federation

Various	Xerox Corporation	Duplicating	\$ 958.95
Various	C&P Telephone	Telephone	11.07
Various	U.S. Postal Service	Postage	75.32
Various	A&P Employees	Local Transportation	22.65
Various	A&P Employees	Cash Expense	13.55
Various	J. Guttentag	Travel Expense	<u>149.75</u>
Total			\$ 1,231.29

Dr. Dirk Alan Maxen-McIntire

03/20/80	U.S. Postal Service	Postage	\$ <u>22.62</u>
Total			\$ 22.62

British American Arts Association (U.K.)

Various	Xerox Corporation	Duplicating	\$ 11.58
Various	C&P Telephone	Telephone	92.52
Various	U.S. Postal Service	Postage	110.00
Various	A&P Employees	Local Transportation	27.00
05/06/80	H. Sandison	Travel Expense	<u>382.00</u>
Total			\$ 623.10

*/ This list includes only disbursements made after the exemption from registration for representation of this client no longer applied.

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Government of the Republic of Panama</u>			
Various	Xerox Corporation	Duplicating	\$ 1.80
Various	C&P Telephone	Telephone	500.96
Various	U.S. Postal Service	Postage	1.72
Various	A&P Employees	Cash Expense	27.75
Various	RCA Global Communications	Telexes	106.56
02/26/80	Western Union	Telegrams	8.64
Total			\$ 647.43
<u>Asociacion de Fabricantes de Productores Quimicos</u>			
03/28/80	Xerox Corporation	Duplicating	\$ 13.50
Various	C&P Telephone	Telephone	58.33
05/22/80	RCA Global Communication	Telexes	31.68
Total			\$ 103.51
<u>Table Grape Growers Association</u>			
Various	Xerox Corporation	Duplicating	\$ 60.25
04/23/80	C&P Telephone	Telephone	12.39
Various	A&P Employees	Local Transportation	27.85
Various	A&P Employees	Cash Expense	28.25
05/16/80	B. Landau	Travel Expense	1,000.78
05/16/80	P. Green	Travel Expense	959.35
05/14/80	Western Union	Telegram	15.96
05/22/80	RCA Global Communication	Telexes	103.74
Total			\$ 2,208.57
<u>Government of Nicaragua</u>			
Various	Xerox Corporation	Duplicating	\$ 491.20
Various	C&P Telephone	Telephone	1,022.37
Various	U.S. Postal Service	Postage	48.27
Various	A&P Employees	Local Transportation	50.20
Various	A&P Employees	Cash Expense	52.80
12/31/79	Sprint Packages	Air Courier	27.75
01/09/80	Luce, Forward Hamilton & Scripps Service	Professional Service	594.99
12/27/79	P. Reichler	Travel Expense	30.45
02/26/80	Western Union	Telegram	95.81
02/26/80	RCA Global Communication	Telexes	25.92
Total			\$ 2,439.76

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Union Nacional de Productores de Hortalizas</u>			
Various	Xerox Corporation	Duplicating	\$ 6,721.08
Various	C&P Telephone	Telephone	1,919.53
Various	U.S. Postal Service	Postage	271.30
Various	A&P Employees	Local Transportation	687.60
Various	A&P Employees	Cash Expense	578.92
Various	L. Sunderland	Cash Expense	41.67
Various	Sprint Packages	Air Courier	549.71
Various	P. Macrory	Travel Expense	1,332.22
Various	A. Bennett	Travel Expense	386.31
12/14/79	W. Rogers	Travel Expense	16.42
02/26/80	E. Veron	Travel Expense	156.73
02/13/80	A&P Employees	NYC Messenger	333.00
03/04/80	Western Union	Telegram	46.55
03/04/80	RCA Global Communication	Telexes	160.15
03/04/80	Produce News	Publication	15.00
Various	Neal R. Gross & Co.	Depositions & Transc.	214.37
Various	Charles R. Mann Assoc.	Professional Service	15,324.49
Various	Sati Rikhy	Professional Service	3,832.00
01/11/80	Charles E. Simon	Documents	22.42
01/12/80	Wender, Murare & White	Professional Service	8,892.50
Various	Richard L. Simons	Consultant Fee	17,990.14
12/31/80	Jimmy E. Hillman	Professional Service	100.00
Various	Florida Clipping Service	Clipping Service	304.00
02/27/80	Robert S. Firch	Professional Service	100.00
03/27/80	University of Arizona	Computer Usage	100.00
Various	Informatics, Inc.	Commputer Service	41,523.73
03/24/80	Richard King	Consultant Fee	750.00
03/24/80	William Nordaus	Consultant Fee	2,460.00
Various	H.S. Houtakker	Professional Service	1,265.10
04/02/80	John H. Jackson	Professional Service	1,104.50
02/05/80	A&P Employees	Cash Expense	10.50
03/28/80	A&P Employees	Local Transportation	13.00
05/14/80	RCA Global Communication	Telexes	14.63
Total			\$ 107,237.57

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
Lawrence Sunderland (Consultant Services to Foreign Principals and Registrant's Other Clients)			
02/04/80	Lawrence Sunderland	Professional Services	\$ 2,083.33
02/29/80	Lawrence Sunderland	Professional Services	2,083.33
04/01/80	Lawrence Sunderland	Professional Services	2,083.33
05/02/80	Lawrence Sunderland	Professional Services	2,083.33
06/02/80	Lawrence Sunderland	Professional Services	<u>2,083.33</u>
Total			\$ 10,416.65

Ets. Beherman Demoen N.V./S.A. ^{*/}

Various	Xerox Corporation	Duplicating	\$ 358.72
Various	C&P Telephone	Telephone	308.04
Various	A&P Employees	Local Transportation	332.10
Various	A&P Employees	Cash Expense	58.00
Various	RCA Global Communication	Telexes	422.50
Various	Western Union	Telegram	69.40
Various	Sprint Package	Air Courier	107.10
Various	W. Rogers	Travel Expense	1,051.65
Various	J. Jones	Travel Expense	384.12
Various	D. Towey	Travel Expense	372.85
02/11/80	Wilson Gill	Rental Equipment	25.20
05/13/80	Treasurer of U.S.	Printing	<u>5.68</u>
Total			\$ 3,495.36
TOTAL			<u>\$ 142,614.72</u>

^{*/} This list includes only disbursements made after the exemption from registration for representation of this client no longer applied.

ATTACHMENT NO. 9

15.(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this six-month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes _____ No X */

If yes, furnish the following information:

*/ However, the following persons who have filed Short-Form Registration Statements have made political contributions:

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<u>James A. Beat</u>			
4/16/80	\$100	National Committee for an Effective Congress	Various
<u>Alexander E. Bennett</u>			
12/10/79	\$200	Kennedy for President Committee	Edward Kennedy
4/3/80	\$100	Anderson for President Committee	John Anderson
<u>Paul S. Berger</u>			
3/25/80	\$500	Democratic Congressional Dinner	Various
4/30/80	\$1,000	Re-elect Bob Packwood Committee	Robert Packwood
5/8/80	\$100	Culver Citizens Committee	Culver
5/14/80	\$500	Frank Church Comm.	Frank Church
<u>Paul Besozzi</u>			
1/10/80	\$100	Pierce O'Donnell for Congress Committee	Pierce O'Donnell
3/12/80	\$50	Pierce O'Donnell for Congress Committee	Pierce O'Donnell

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Pplitical Organization</u>	<u>Name of Candidate</u>
<u>Myron P. Curzan</u>			
1/13/80	\$25	Dollars for Democrats	Various
3/18/80	\$100	Anderson for President	John Anderson
3/18/80	\$100	Kennedy for President	Edward Kennedy
5/1/80	\$200	Kennedy for President	Edward Kennedy
<u>Vicki J. Divoll</u>			
1/23/80	\$50	Kennedy for President	Edward Kennedy
4/30/80	\$75	Kennedy for President	Edward Kennedy
<u>Joseph H. Guttentag</u>			
2/80	\$150	Kennedy for President	Edward Kennedy
<u>Richard L. Hubbard</u>			
3/28/80	\$15	Dollars for Democrats (D.C.)	Various
<u>David R. Kentoff</u>			
2/22/80	\$25	Barnes for Congress	Mike Barnes
<u>Daniel Lewis</u>			
2/23/80	\$50	Mike Barnes for Con- gress Committee	Mike Barnes
5/23/80	\$52.42	Mike Barnes for Con- gress Committee	Mike Barnes
<u>Robert Litan</u>			
4/27/80	\$50	Anderson for President	John Anderson
<u>Thomas Milch</u>			
3/80	\$50	Kennedy for President	Edward Kennedy
<u>John M. Quinn</u>			
1/14/80	\$50	Kennedy for President	Edward Kennedy
<u>William D. Rogers</u>			
1/31/80	\$250	Kennedy for President	Edward Kennedy
1/31/80	\$100	Anderson for President	John Anderson
4/1/80	\$100	Anderson for President	John Anderson

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<u>Lawrence A. Schneider</u>			
12/23/79	\$25	O'Donnell for Congress	Pierce O'Donnell
2/12/80	\$5	Democratic Party Dist. 16	Various
2/13/80	\$25	Women Legislator's Caucus	Various
3/12/80	\$50	O'Donnell for Congress	Pierce O'Donnell
3/16/80	\$5	Barnes for Congress	Mike Barnes
3/24/80	\$4	Democratic Party	Various
4/21/80	\$75	Kathleen O'Reilly for Congress	Kathleen O'Reilly
5/1/80	\$25	Kathleen O'Reilly for Congress	Kathleen O'Reilly
5/16/80	\$15	Barnes for Congress	Mike Barnes
5/23/80	\$52.41	Barnes for Congress	Mike Barnes
<u>Cary Sherman</u>			
2/18/80	\$50	Mike Barnes for Congress Committee	Mike Barnes
<u>Lawrence Sunderland</u>			
4/27/80	\$50	National Committee for an Effective Congress	Various
<u>David P. Towey</u>			
1/23/80	\$50	Kennedy for President	Edward Kennedy

ATTACHMENT 1

8. List every foreign principal of the individual or organization named in Item 7.

Ambassador of the Swiss Confederation
Swiss Cheese Union, Inc.
Switzerland Gruyere Processed Cheese Manufacturers
Association
Federation Suisse des Associations de Fabricants
d'Horlogerie
Embassy of the Government of Israel
International Commodities Clearing House, Ltd.
The London Commodity Exchange Company, Ltd.
Union Nacional de Productores de Hortalizas
Government of the Republic of Panama
Asociacion de Fabricantes de Productores Quimicos
Government of Morocco
Government of Nicaragua
British American Arts Association (U.K.)
Dr. Dirk Alan Maxen-McIntire
Ets. Beherman Demoen N.V./S.A., Engineering Division
Corporation for Economic Development H.I. Ltd.
Dutch Employers Federation
Table Grape Growers Association

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COMMUNITY
FEDERATION UNIT